## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

	,
CHMURA ECONOMICS &	)
ANALYTICS, LLC,	)
DI : (188/C) / I !	)
Plaintiff/Counterclaim	)
Defendant,	) Case No. 3:19-cv-813-REF
v.	)
	)
RICHARD LOMBARDO,	)
	)
Defendant/Counterclaim	)
Plaintiff.	)

## JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Plaintiff Chmura Economics & Analytics, LLC and defendant Richard Lombardo (collectively, the "Parties"), by counsel, respectfully move this Court for entry of the attached, proposed Stipulated Protective Order.

In support of this Motion, the Parties submit that certain discovery materials to be exchanged in this case, including documents, interrogatory answers, deposition testimony, and other discovery, will likely contain non-public information of a personal, financial, and/or commercial nature which may constitute trade secret, confidential or proprietary information. To protect such trade secret, confidential or proprietary information, the parties jointly request that the Court enter the attached proposed Stipulated Protective Order so that any documents containing such information will be treated in accordance with that Order.

Accordingly, the Parties request that this Court enter the attached, proposed Stipulated Protective Order.

March 16, 2020

Respectfully submitted,

## CHMURA ECONOMICS & ANALYTICS, LLC

By	<b>7:</b>	/ <sub>S</sub> /	

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 16th day of March, 2020 a copy of the foregoing was filed with the Court's CM/ECF system, which will send a notice of electronic filing (NEF) to all counsel of record.

<u>/s</u>/

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